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7 *Las Vegas Metropolitan Police Department*
Officer Kenshin Rose
8 *Officer Zoe Pappas*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 ***

12 DEYANNIA SHIPP,

13 Plaintiff,

14 vs.

15 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, OFFICER K. ROSE,
16 OFFICER Z. PAPPAS, DOLLAR TREE,
INC., and DOES 1 through 10, inclusive,
17

18 Defendants.

CASE NO. 2:24-cv-02062-GMN-EJY

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES AND
CONTINUE TRIAL**

[SECOND REQUEST]

19
20 Pursuant to LR IA 6-1 and LR 26-3, the parties, by and through their respective counsel of
21 record, hereby stipulate and request that this Court extend discovery in the above-captioned case
22 by ninety-one (91) days, up to and including Monday, January 26, 2026. In addition, the parties
23 request that all other future deadlines contemplated by the Discovery Plan and Scheduling Order
24 be extended pursuant to Local Rule. In support of this Stipulation and Request, the parties state as
25 follows:

- 26 1. On November 4, 2024, Plaintiff filed his Complaint in the United States District
27 Court, Nevada. (ECF No. 1).

- 1 2. On January 27, 2025, Defendants Las Vegas Metropolitan Police Department and
- 2 Officers Z. Pappas, and K. Rose (“Metro Defendants”) filed their Answer to
- 3 Plaintiff’s Complaint. (ECF No. 15).
- 4 3. On January 27, 2025, Defendant Dollar Tree, Inc., (“Dollar Tree”) filed its Answer
- 5 to Plaintiff’s Complaint. (ECF No. 18).
- 6 4. On March 13, 2025, the Court entered the Discovery Plan and Scheduling Order.
- 7 (ECF No. 24).
- 8 5. On March 24, 2025, Metro Defendants served their Initial FRCP 26 Disclosures.
- 9 6. On May 2, 2025, Metro Defendants served their First Supplement to FRCP 26
- 10 Disclosures.
- 11 7. On March 12, 2025 Dollar Tree served their Initial and First Supplemental FRCP
- 12 26 Disclosures.
- 13 8. On May 1, 2025, Plaintiff served her Initial FRCP 26 Disclosures.
- 14 9. On May 14, 2025, Plaintiff served written discovery on Defendants. LVMPD
- 15 Defendants served their responses on June 12, 2025.
- 16 10. On May 19, 2025 LVMPD Defendants served written discovery on Plaintiff.
- 17 Plaintiff served her responses on June 27, 2025.
- 18 11. On July 1, 2025, Plaintiff served her Second Supplemental FRCP 26 Disclosures.

19 DISCOVERY REMAINING

- 20 1. Defendants will take the deposition of Plaintiff.
- 21 2. Plaintiff will take the deposition of Defendants.
- 22 3. Defendants will collect any and all relevant medical and/or mental health records
- 23 and/or billing related to the allegations contained in Plaintiff’s Complaint.
- 24 4. Defendants may depose Plaintiff’s medical and/or mental health providers once
- 25 able to collect any and all relevant medical and/or mental health records and billing.
- 26 5. Defendants may depose Plaintiff’s expert witnesses.
- 27 6. The parties may depose any and all other witnesses identified through discovery.

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1 **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

2 The parties aver, pursuant to Local Rule 26-3, that good cause exists for the requested
3 extension. This Request for an extension of time is not sought to delay the proceedings or for any
4 improper purpose.

5 Counsel for Metro Defendants is in the process of preparing for Mediation in the matters
6 entitled, *Veladores v. Las Vegas Metropolitan Police Department* Case No. 2:17-cv-00062-RFB-
7 MDC and *Hollingsworth v. City of North Las Vegas*, Case No. 2:21-cv-02230-CDS-NJK.
8 Counsel for Metro Defendants is also preparing for settlement conference in *Maas v. City of North*
9 *Las Vegas, et al*, Case No. 2:22-cv-00568-GMN-DJA.

10 In addition, the parties are engaged in a discovery dispute regarding the medical
11 authorizations requested from Plaintiff. The associated meet and confer conference is scheduled
12 for July 30, 2025. As a result, the parties have been unable to obtain Plaintiff's medical records
13 necessary for evaluating Plaintiff's claims.

14 Counsel for Plaintiff was in trial a two-week trial in the Los Angeles County Superior
15 Court in the matter of *Adams v. Meiri*, Case No. 20STCV316325 during the month of June 2025.
16 Additionally, counsel was prepared Answering Brief in the matter of *Parham v. City of West*
17 *Covina*, Case 24-5250 before U.S. Courts of Appeals for the Ninth Circuit on or about June 16,
18 2025. Furthermore, Plaintiff has been diligent in obtaining medical records to provide to
19 defendants however, the treating doctors have not provided the documents in a timely fashion.
20 Further, counsel for Plaintiff has been pre-planned vacations and 3-day continuing legal education
21 conference during the months of July and August 2025.

22 Counsel for Dollar Tree is in the process of preparing for mediation in *Davison v Family*
23 *Dollar LLC* A-24-903463-C and is awaiting a decision on the Motion for Summary Judgement
24 filed in this matter on May 14, 2025. Additionally, Counsel for Dollar Tree will be out of the
25 jurisdiction from September 22, 2025 through October 12, 2025.

26 The parties require additional time to complete case depositions. For those reasons, the
27 parties respectfully request an extension of the discovery deadlines in this matter.

Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-3 governs modifications or extension of the Discovery Plan and Scheduling Order. Any stipulation or motion to extend or modify that Discovery Plan and Scheduling Order must be made no later than twenty-one (21) days before the expiration of the subject deadline and must comply fully with LR 26-3.

This is the second request for extension of time in this matter. The parties respectfully submit that the reasons set forth above constitute compelling reasons for the extension.

The following is a list of the current discovery deadlines and the parties' proposed extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	<i>Monday, October 27, 2025</i>	<i>Monday, January 26, 2026</i>
Deadline to Amend Pleadings or Add Parties	<i>Tuesday, July 29, 2025</i>	<i>Tuesday, October 28, 2025</i>
Expert Disclosure pursuant to FRCP26 (a)(2)	<i>Thursday, August 28, 2025</i>	<i>Thursday, November 27, 2025</i>
Rebuttal Expert Disclosure pursuant to FRCP. 26(a)(2)	<i>Monday, September 29, 2025</i>	<i>Monday, December 29, 2025</i>
Dispositive Motions	<i>Wednesday, November 26, 2025</i>	<i>Wednesday, February 25, 2026</i>
Joint Pretrial Order	<i>Friday, December 26, 2025</i>	<i>Friday, March 27, 2026</i> <i>If dispositive motions are pending, the parties will submit their Joint Pretrial Order within thirty (30) days of the Court's order as to any dispositive motions.</i>

WHEREFORE, the parties respectfully request this Court extend the discovery period by ninety-one (91) days from the current deadline of October 27, 2025,

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up to and including January 26, 2026, and extend the other dates as outlined in accordance with the table above.

IT IS SO STIPULATED.

DATED the 1st day of August, 2025.

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DATED the 1st day of August, 2025.

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DATED the 1st day of August, 2025.

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ORDER

IT IS SO ORDERED.

Dated this 4th day of August, 2025.


UNITED STATES MAGISTRATE JUDGE